

Requirements for Sludge and Septage Management Plans

July 31, 1998

The Department of Environmental Conservation has examined options to reduce permitting of facilities and activities that pose little or low public health and environmental impacts and may have duplicate or overlapping regulatory oversight. A revision was made to the statute which defines the requirements for obtaining a Solid Waste certification as a result of this initiative. Previous to this change, the law required all solid waste facilities to be certified, which included all sludge and septage storage and treatment facilities, even those which are located at wastewater treatment facilities (WWTFs). The Department has deliberately been slow to enforce this requirement and prompted the legislature to modify it. In the 1997 session, the law was revised (10 VSA Section 6605(a)). The law now allows the option for certain facilities to obtain approval of a sludge and septage management plan rather than obtain a certification for the facility. Specifically, facilities that are located at WWTFs are no longer required to obtain a Solid Waste certification, provided that the following conditions are met:

- 1) the facility must be a sludge or septage treatment or storage facility located within the fenced area of a domestic wastewater treatment plant;
- 2) the treatment facility does not utilize a process to further reduce pathogens in order to qualify the product for marketing and distribution;
- 3) the facility is not a drying bed, lagoon, or non-concrete bunker; and
- 4) the owner of the facility has submitted a sludge and septage management to the Department and the Department has approved the plan.

In addition to the 1997 statutory change, the Vermont Solid Waste Management Rules have recently been revised to require all owners of WWTFs that generate sludge from the treatment of domestic waste to submit sludge management plans for review and approval. This means that **any domestic WWTF that is not required to have a Solid Waste Management Certification** (and does not have a valid certification) **must submit a sludge management plan and obtain approval of the plan.** (Please see section 6-310 of the Solid Waste Management Rules, effective July 1 1998.)

This document outlines the items that should be included in a Sludge and Septage Management Plan.

Facility information

- A. Identify facility owner by name, mailing address, and telephone number
- B. Identify operators, contact people, and authorized representative by name, mailing address, and telephone number
- C. Identify location of facility (include a map)

Management of Sludge

- D. Sludge Treatment/Storage/Volume:
Describe how sludge is managed at the WWTF (one or more paragraphs describing treatment and storage units with a schematic). Identify the type and capacity of units involved (for example, two 10,000 gallon concrete storage tanks). Include the volume of sludge managed at the facility in terms of percent solids and in dry weight (provide calculations).
- E. Sludge Disposal:
Describe the management (disposal) strategy for sludge generated and include a contingency plan to use when the primary plan is not available. If managed within VT, written agreement with recipients must be included. Letters from recipients are sufficient.
- F. Sludge Quality:
Identify whether there are any pretreatment qualifications or standards that must be met for the selected management option (such as volatile solids reduction, metals, or TCLP). Provide information/data that demonstrates how these qualifications and standards will be met. For example, if the biosolids must be digested to PSRP standards to be shipped to a regional composting facility, provide detailed information regarding the digestion capability of all digestion units involved, such as primary and secondary units.
- G. Sampling:
Identify the parameters and frequency for testing to demonstrate compliance with pretreatment qualifications or standards for the selected management option and contingency. For example, for the biosolids to qualify to go to a landfill, testing for percent solids or the "paint filter" test must be done as well as periodic TCLP testing.

H. Spill Response Plan:

Include one or more paragraphs describing how any spills of sludge or septage would be contained, managed, and reported, if such spills should occur at the WWTF.

General Information

I. Reporting/Record Keeping:

Include a paragraph on fulfilling quarterly reporting requirements and reporting of complaints, emissions or spills. A statement needs to be included describing how records will be safely kept for a period of at least five years.

J. Compliance with Solid Waste Implementation Plan:

Include evidence of compliance with the approved and adopted solid waste implementation plan for the municipality in which the facility is located. Compliance may be documented by submitting information, such as photocopies of the appropriate section of the adopted plan.

K. Pollution Prevention:

Include a paragraph describing any pollution prevention plan to maintain and improve sludge quality (e.g. corrosion control for drinking water, supporting hazardous waste collection in service area, etc.). This item is not required to obtain approval of this plan, but should seriously be considered by the owner of the facility.

L. Signature: Must be signed and dated by an authorized representative, using the following statement or other approved statement:

I, _____, a duly authorized representative for _____
(such as municipality or name of owner of private facility), submit this Sludge
and Septage Management Plan.

Signature

Date